IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

ROCKFORD PARK DISTRICT

Plaintiff,

No. 08 C 02676

v.

Judge Philip G. Reinhard

TIG INSURANCE COMPANY

Magistrate Judge P. Michael Mahoney

Defendant.

MOTION FOR LEAVE TO SUBSTITUTE ATTORNEYS OF RECORD AND LEAVE TO WITHDRAW AS COUNSEL

Defendant, TIG Insurance Company, as Successor by Merger to International Insurance Company, by and through its attorneys, SmithAmundsen LLC, pursuant to Local Rule 83.17 of the Rules of the United States District Court for the Northern District of Illinois, moves this Court for Leave to Substitute Attorneys or Record and Leave to Withdraw As Counsel, and states as follows:

- 1. This action was filed by Rockford Park District on May 8, 2008.
- 2. On May 8, 2008, Ilene M. Korey and on May 21, 2008 C. Kyle Lang of Clausen Miller, PC, 10 S. LaSalle Street, Chicago, Illinois 60603-1098, filed appearances as attorneys of record for TIG.
- 3. TIG has decided to retain Timothy J. Fagan of SmithAmundsen LLC, 150 N. Michigan Avenue, Suite 3300, Chicago, Illinois 60601 and Ruth E. Robinson of SmithAmundsen LLC, Stewart Square, 308 W. State Street, Rockford, Illinois 61101-1140 to substitute as attorneys of record to represent the interests of TIG in this action.

4. Both Timothy J. Fagan and Ruth E. Robinson are attorneys admitted to practice in the Northern District of Illinois and the State of Illinois.

5. Ms. Korey and Mr. Lang consent to this substitution as evidenced by their respective signatures on the attached "Substitution of Counsel".

WHEREFORE, Defendant, TIG Insurance Company, as Successor by Merger to International Insurance Company, respectfully moves this Court, pursuant to Local Rule 83.17, for leave to have Timothy J. Fagan and Ruth E. Robinson substitute as counsel of record for TIG and grant leave for Ilene M. Korey and C. Kyle Lang to withdraw as counsel of record.

Respectfully submitted,

TIG Insurance Company, as Successor by Merger to International Insurance Company

By: /s/ Ruth E. Robinson
One of its Attorneys

Ruth E. Robinson, Esq. (ARDC No. 6207546) Stewart Square 308 W. State Street Rockford, Illinois 61101-1140

Telephone: (815) 987-0441 Facsimile: (815) 987-9891

Timothy J. Fagan, Esq. (ARDC No. 6202552) SmithAmundsen LLC 150 North Michigan Avenue, Suite 3300 Chicago, Illinois 60601

Telephone: (312) 894-3200 Facsimile: (312) 894-3210

NOTICE OF FILING

To: Ilene M. Korey Marc C. Gravino
C. Kyle Lang WilliamsMcCarthy LLC
Clausen Miller, PC 120 W. State Street
10 South LaSalle Street P.O. Box 219
Chicago, IL 60603-1098 Rockford, IL 61105

PLEASE TAKE NOTICE that on the 13th day of June, 2008, the defendant, TIG Insurance Company, caused the attached motion for Leave to Substitute Attorneys of Record and Leave to Withdraw as Counsel to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Western Division.

s/Ruth E. Robinson Attorney for Defendant Ruth E. Robinson Bar Number: 06207546 SMITHAMUNDSEN LLC 308 W. State Street, Suite 320 Rockford, Illinois 61101 Phone: (815) 987 0441

Phone: (815) 987-0441 Fax: (815) 987-9897

Email: rrobinson@salawus.com

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

Ilene M. Korey
Marc C. Gravino
C. Kyle Lang
WilliamsMcCarthy LLC
Clausen Miller, PC
120 W. State Street
10 South LaSalle Street
P.O. Box 219
Chicago, IL 60603-1098
Rockford, IL 61105

s/Ruth E. Robinson Attorney for Defendant Ruth E. Robinson Bar Number: 06207546 SmithAmundsen LLC 308 W. State Street, Suite 320 Rockford, Illinois 61101 Phone: (815) 987-0441

Fax: (815) 987-9897 Email: rrobinson@salawus.com